

EXHIBIT A-1

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

1

J11353479 eb

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

SMARTMATIC USA CORP.,
SMARTMATIC
INTERNATIONAL HOLDING
B.V., AND SGO
CORPORATION LIMITED

*
*
*
*
*
*
*
*
*

VS.

CASE NO. 22-cv-0098-WMW-JFD

MICHAEL J. LINDELL
AND MY PILLOW, INC.

VIDEOTAPED DEPOSITION OF MICHAEL JAMES LINDELL

Date

Edith A. Boggs, CSR

6-11-2024

HOUSTON, TEXAS

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

2

DEPOSITION OF MICHAEL JAMES LINDELL

DEPOSITION AND ANSWERS of MICHAEL JAMES LINDELL,
taken before Edith A. Boggs, a certified shorthand
reporter in Harris County for the State of Texas, taken
at the Four Seasons Hotel, 1300 Lamar, Houston, Texas,
on the 11th day of June, 2024, between the hours of 9:00
a.m. and 5:56 p.m.

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

3

A P P E A R A N C E S

ATTORNEYS FOR PLAINTIFFS:

Benesch Friedlander Coplan & Aronoff
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606

By: Nicole Wrigley, Esq.
and Julie Loftus, Esq.

ATTORNEY FOR DEFENDANTS:

McSweeney Cynkar & Kachouroff, PLLC
13649 Office Place, Suite 101
Woodbridge, Virginia 22192

By: Christopher Kachouroff, Esq.

ALSO PRESENT:

Ms. Avery Suarez, Videographer

REPORTED BY:

Ms. Edith A. Boggs

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

4

EXAMINATION INDEX

QUESTIONS BY

PAGE

Ms. Wrigley

9

INDEX OF EXHIBITS

NO.	PAGE FIRST REFERENCED	DESCRIPTION
Exhibit 432	152	Flash drive - War Room 2-5-21
Exhibit 435	185	Flash drive - OANN Dan Ball 2-8-21
Exhibit 582	304	Post by Chris Krebs
Exhibit 586	15	Messages between Jim Furlong and Mike Lindell
Exhibit 587	33	"Exhibit 140" - CNN article - How Mike Lindell, the MyPillow guy, became a midterm messenger
Exhibit 588	41	Messages between Mike Lindell and Scott Baio
Exhibit 589	47	Messages between Mike Lindell and Paul Ess
Exhibit 590	55	Messages between Kim Rasmussen and Mike Lindell
Exhibit 591	60	Messages between Corey Lewandowski and Mike Lindell
Exhibit 592	64	Messages between Mary and Mike Lindell

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

5

1	Exhibit 593	67	Messages between Katelyn Gamlin, Michelle Media and Mike Lindell
2			
3	Exhibit 594	70	Messages between Mike Lindell and Steve Bannon
4			
5	Exhibit 595	102	"Exhibit 2" - "Absolute Proof" screenshots
6	Exhibit 596	126	Flash drive - "Absolute Proof" Clip 1
7			
8	Exhibit 597	135	MyPillow CEO released a movie pushing election fraud conspiracies, YouTube and Vimeo took it down
9			
10	Exhibit 598	171	Flash drive - War Room 2-6-21 Clip 1
11			
12	Exhibit 599	173	Flash drive - War Room 2-6-21 Clip 3
13	Exhibit 600	182	Disclaimer
14	Exhibit 601	201	Flash drive - AS&C of "Absolute Proof" Hour 1 Clip 1
15			
16	Exhibit 602	202	Flash drive - AS&C of "Absolute Proof" Hour 1 Clip 2
17			
18	Exhibit 603	205	Flash drive - AS&C of "Absolute Proof" Hour 2 Clip 1
19			
20	Exhibit 604	210	Series of E-mails, starting with an E-mail dated 2-18-21 from Katelyn Gamlin
21			
22	Exhibit 605	214	Series of E-mails, starting with an E-mail dated 2-19-21 from Chris Deluge
23			
24	Exhibit 606	218	Messages between Alexa Wall Street Journal and Mike Lindell
25			

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

6

1	Exhibit 607	234	"Exhibit 4" - "Scientific Proof" screenshots
2			
3	Exhibit 608	234	Flash drive - "Scientific Proof" Clip 1
4	Exhibit 609	234	Flash drive - "Scientific Proof" Clip 2
5			
6	Exhibit 610	234	Flash drive - "Scientific Proof" Clip 3
7	Exhibit 611	234	"Exhibit 6" - "Absolute Interference" screenshots
8			
9	Exhibit 612	242	Flash drive - "Absolute Interference" Clip 1
10	Exhibit 613	242	Flash drive - "Absolute Interference" Clip 2
11			
12	Exhibit 614	242	Flash drive - "Absolute Interference" Clip 5
13	Exhibit 615	246	Flash drive - War Room 3-26-21 Clip 1
14			
15	Exhibit 616	246	Flash drive - War Room 3-26-21 Clip 2
16	Exhibit 617	271	"Exhibit 8" - Absolutely 9-0 screenshots
17			
18	Exhibit 618	273	Flash drive - Absolutely 9-0 Clip 1
19	Exhibit 619	276	Cyber Symposium news alert
20	Exhibit 620	279	Flash drive - Cyber Symposium Clip 1
21			
22	Exhibit 621	285	Event: Accepted: Discussion with Brent from Canada re Smartmatic
23			
24	Exhibit 622	291	"Exhibit 101" - The Times Called Officials in Every State: No Evidence of Voter Fraud
25			

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

7

1	Exhibit 623	298	"Exhibit 110" - Fired
2			Director of U.S. Cyber
3			Agency Chris Krebs Explains
4			Why President Trump's Claims
5	Exhibit 624	309	of Election Interference are
6			False
7			
8	Exhibit 625	315	"Exhibit 111" - Disputing
9			Trump, Barr says no
10			widespread election fraud
11			
12	Exhibit 626	322	"Exhibit 72" - Dominion
13			Voting Systems Categorically
14	Exhibit 627	331	Denies False Assertions
15			About Vote Switching and
16	Exhibit 628	340	Software Issues With Our
17			Voting Systems
18			
19	Exhibit 629	347	"Exhibit 66" - Smartmatic
20			Fact-checked
21	Exhibit 630	349	E-mail dated 12-23-20 from
22			Ise Tiapula, with attachment
23	Exhibit 631	370	E-mail dated 1-9-21 from
24			Michael Lindell to Mike
25	Exhibit 632	383	Lindell, with attachment
	Exhibit 633	388	E-mail dated 3-27-21 from
			Michael Lindell to Mike
			Lindell, with attachment
			E-mail dated 2-5-21 from
			Michael Lindell to Mike
			Lindell, with attachment
			Series of E-mails, starting
			with an E-mail dated 1-1-21
			from Scott Hennen
			Series of E-mails, starting
			with an E-mail dated 1-2-21
			from Scott Hennen
			"Exhibit 115" -
			Cybersecurity &
			Infrastructure Security
			Agency, #Proctect2020 Rumor
			vs. Reality

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

8

1	Exhibit 634	396	"Exhibit 105" -
2			Cybersecurity &
3			Infrastructure Security
4			Agency, Joint Statement from
5			Elections Infrastructure
6			Government Coordinating
7	Exhibit 635	400	Council & the Election
8			Infrastructure Sector
9			Coordinating Executive
10	Exhibit 636	408	Committees
11	Exhibit 637	412	"Exhibit 51" - Secretary of
12			State Jocelyn Benson -
13			Michigan's election was
14			secure and fair, and the
15	Exhibit 638	433	results are accurate
16	Exhibit 639	443	Messages between Kim
17	NO EXHIBIT 640		Rasmussen and Mike Lindell
18	Exhibit 641	445	Business Insider - MyPillow
19			CEO Mike Lindell is
20			releasing a 3-hour movie he
21			made over the past 5 days
22			pushing a baseless election
23			claim involving China
24			Messages between Mike
25			Lindell and Scott Baio
			E-mail dated 1-10-21 from
			Mary Fanning, Key Points
			Messages between Darren
			Lindell and Mike Lindell

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

9

PROCEEDINGS

08:56AM

THE VIDEOGRAPHER: Good morning. We are now on the record. Today's date is June 11th, 2024, and the current time is 9:00 a.m. This begins the videotaped deposition of Mike Lindell.

08:56AM

09:00AM

09:00AM

09:00AM

Counsel, will you please introduce yourselves, and the witness will be sworn.

09:00AM

09:00AM

MS. WRIGLEY: Yes. Nicole Wrigley for the Smartmatic plaintiffs.

09:00AM

09:00AM

MS. LOFTUS: Julie Loftus also for the Smartmatic plaintiffs.

09:01AM

09:01AM

MR. KACHOUROFF: Chris Kachouroff for the -- counsel for both Mr. Lindell and MyPillow.

09:01AM

09:01AM

THE WITNESS: Michael James Lindell.

09:01AM

MICHAEL JAMES LINDELL was called as a witness and, being first duly sworn by the notary, testified as follows:

09:01AM

09:01AM

09:01AM

EXAMINATION

09:01AM

Q. (BY MS. WRIGLEY) Good morning. Please state and spell your full name for the record.

09:01AM

09:01AM

A. Michael James Lindell, M-I-C-H-A-E-L, J-A-M-E-S, L-I-N-D-E-L-L.

09:01AM

09:01AM

Q. What is your home address, Mr. Lindell?

09:01AM

A. I don't know. I just got a new place last year. You can use 1550 Audubon Road, Chaska, Minnesota

09:01AM

09:01AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

10

1 55318.

09:01AM

2 Q. Do you have any other residences besides the
3 one you just identified?

09:01AM

09:01AM

4 A. No. That's my corporate office. My residence
5 I have is my only residence in Texas.

09:01AM

09:01AM

6 Q. And where in Texas is that residence?

09:01AM

7 A. It's in Lufkin, Texas.

09:01AM

8 Q. Are you --

09:01AM

9 A. I don't know the physical address.

09:01AM

10 Q. Are you currently residing in Texas,
11 Mr. Lindell?

09:01AM

09:02AM

12 A. Yes. And I'm not -- I'd rather even not put
13 that address on public record because, as you know, you
14 guys leak stuff out of depositions, and I don't want
15 people knocking on my door.

09:02AM

09:02AM

09:02AM

09:02AM

16 MS. WRIGLEY: I'm going to move to strike
17 as nonresponsive everything after "yes."

09:02AM

09:02AM

18 Q. (BY MS. WRIGLEY) Mr. Lindell, do you
19 understand that you're providing testimony today under
20 oath?

09:02AM

09:02AM

09:02AM

21 A. Yes.

09:02AM

22 Q. Do you understand that you have to tell the
23 truth no matter what?

09:02AM

09:02AM

24 A. Yes.

09:02AM

25 Q. Do you understand your testimony is being

09:02AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

11

1 recorded by a court reporter here?

09:02AM

2 A. Yes.

09:02AM

3 Q. Do you understand your testimony is being
4 videotaped today?

09:02AM

09:02AM

5 A. Yes.

09:02AM

6 Q. Do you understand your testimony can be shown
7 to a jury in this case?

09:02AM

09:02AM

8 A. Yes.

09:02AM

9 Q. Do you understand --

09:02AM

10 MR. KACHOUROFF: I'm going to object. This
11 wasn't designated for trial. If this is a trial
12 deposition, I'll be doing a lot of objecting.

09:02AM

09:02AM

09:02AM

13 MS. WRIGLEY: Since it's a federal case,
14 there is no discovery or evidence depositions, it's
15 just --

09:02AM

09:02AM

09:02AM

16 MR. KACHOUROFF: Actually, Rule 30 and
17 Rule 45 talks about it.

09:02AM

09:02AM

18 MS. WRIGLEY: What rule are you citing to?

09:02AM

19 MR. KACHOUROFF: Rule 30 and Rule 45 of
20 the --

09:02AM

09:02AM

21 MS. WRIGLEY: Yes.

09:02AM

22 MR. KACHOUROFF: -- Federal Rules of Civil
23 Procedure.

09:03AM

09:03AM

24 MS. WRIGLEY: Yes, indeed, but there is no
25 distinction between a discovery or a trial deposition.

09:03AM

09:03AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

12

1	MR. KACHOUROFF: Okay. Well, I'll be	09:03AM
2	making a lot of objections then.	09:03AM
3	MS. WRIGLEY: That's fine. That's fine.	09:03AM
4	Q. (BY MS. WRIGLEY) Okay. Do you understand that	09:03AM
5	your testimony can be shown to a jury in this case,	09:03AM
6	Mr. Lindell?	09:03AM
7	A. Yes.	09:03AM
8	Q. Do you understand your testimony can be shown	09:03AM
9	to the judge in this case?	09:03AM
10	A. Yes.	09:03AM
11	Q. Do you know of any reason that would prevent	09:03AM
12	you from providing accurate testimony here today?	09:03AM
13	A. No.	09:03AM
14	Q. Before we get started, I want to go over some	09:03AM
15	rules and protocols on the record for this deposition.	09:03AM
16	You have been deposed a number of times, correct?	09:03AM
17	A. Yes.	09:03AM
18	Q. How many times, sir?	09:03AM
19	A. I don't know. Two, three. I have no idea.	09:03AM
20	Q. When was the last time you were deposed?	09:03AM
21	A. A year ago.	09:03AM
22	Q. In what case?	09:03AM
23	A. In the Eric Coomer.	09:03AM
24	Q. And you've not been deposed since then, sir?	09:03AM
25	A. Huh-uh.	09:03AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

13

1 Q. Okay.

09:03AM

2 A. No.

09:03AM

3 Q. Since you've been deposed, you may be familiar
4 with these, but I'll go over them just in case, a few
5 ground rules.

09:03AM

09:03AM

09:03AM

6 We have a court reporter to my right here

09:03AM

7 taking down my questions and your answers, and so it's

09:03AM

8 really important that we avoid talking over each other

09:03AM

9 or interrupting. It's bound to happen. We're human

09:04AM

10 beings. But it makes her job much easier and it will

09:04AM

11 make the transcript accurate if we can just try to avoid

09:04AM

12 talking over each other. Is that fair?

09:04AM

13 A. You have a big advantage because I lost my
14 voice.

09:04AM

09:04AM

15 Q. Okay.

09:04AM

16 A. You must have prayed for that.

09:04AM

17 Q. And do you agree, sir?

09:04AM

18 A. Uh-huh. Yes.

09:04AM

19 Q. Okay. Do you understand that all of your

09:04AM

20 answers have to be verbal today as opposed to nodding
21 your head?

09:04AM

09:04AM

22 A. Yes.

09:04AM

23 Q. During my examination, your counsel, who he --
24 which he's just referenced, may object to one of my
25 questions.

09:04AM

09:04AM

09:04AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

14

1 A. Right.

09:04AM

2 Q. Do you understand you are required to answer my
3 question after your counsel objects unless he instructs
4 you not to answer?

09:04AM

5 A. Yes.

09:04AM

6 Q. Similar with us interrupting each other, if
7 your counsel objects, I'll just ask if you give him a
8 minute for him to object, put it on the record before
9 you begin answering, so we can avoid crosstalk. Is that
10 fair?

09:04AM

09:04AM

09:04AM

09:04AM

09:04AM

11 A. Yes.

09:04AM

12 Q. If I ask you a question and you don't
13 understand it, just let me know. Otherwise, I'll assume
14 you understood the question and were able to answer. Is
15 that fair?

09:04AM

09:04AM

09:04AM

09:05AM

16 A. Yes.

09:05AM

17 Q. And if at any point in time -- we talked about
18 this earlier -- you need to take a break, just let me
19 know. I'd just ask if there's a question pending, you
20 answer the question, and we can break if you need a
21 minute off the record. Is that fair?

09:05AM

09:05AM

09:05AM

09:05AM

09:05AM

22 A. Yes.

09:05AM

23 Q. Mr. Lindell, have you ever considered running
24 for political office?

09:05AM

09:05AM

25 A. Yes.

09:05AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

15

1 Q. Which political office have you considered
2 running for?

3 A. It must have been 2000 and -- it was the
4 governor of Minnesota, and it was just a -- I was
5 pondering it.

6 Q. In 2019, were you considering a run for
7 political office such as the governor of Minnesota?

8 A. No, it was 2020 -- after 2020. It was right
9 before the election, I thought maybe the next one, I
10 would run for governor.

11 Q. So in 2020, you were considering potentially
12 making a run to be the governor of Minnesota?

13 A. As I mentioned.

14 Q. Have you ever considered running for president
15 of the United States, sir?

16 A. No.

17 Q. I'm going to show you the first exhibit or
18 document today. Bear with me. There's a process.

19 (Exhibit 586 marked.)

20 Q. (BY MS. WRIGLEY) Mr. Lindell, I'm handing to
21 you what's been marked as Exhibit 586.

22 Just for the record, this is an excerpt
23 from a text chain that was produced by defendants in
24 this case. The Bates number for the full text chain is
25 DEF 121483. This particular text chain as produced was

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

16

1 149 pages. Just so it's clear for the record, this is
2 an excerpt of selected pages only.

3 If you look at the bottom right-hand corner
4 on the first page, sir --

5 A. Yeah.

6 Q. -- you can see after the decimal point, it says
7 Page 1.

8 A. Uh-huh.

9 Q. And then if you flip to the other pages, that
10 number after the decimal point will indicate what
11 pages --

12 A. I got it.

13 Q. -- were excerpted from the document.

14 A. I got it.

15 Q. Okay.

16 MR. KACHOUROFF: I'm going to have an
17 objection to completeness.

18 MS. WRIGLEY: That's fine. Thank you.

19 Q. (BY MS. WRIGLEY) At the top, do you see there
20 are a number of names written with respect to this text
21 message?

22 A. Yes.

23 Q. One of those names is yourself, correct?

24 A. Jim Furlong and Mike Lindell.

25 Q. Do you recognize that to be yourself and your

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

17

1 phone number?

09:07AM

2 A. That's correct.

09:07AM

3 Q. Okay. And who is Jim Furlong?

09:07AM

4 A. Jim Furlong, he's been with me a long time.

09:07AM

5 He's on the board of MyPillow. He's a friend of mine.

09:07AM

6 We go back to 20-some years.

09:07AM

7 Q. At one point, Mr. Furlong was a member of

09:07AM

8 MyPillow's board of directors?

09:07AM

9 A. Yeah.

09:07AM

10 Q. During what period of time?

09:07AM

11 A. I don't know. Maybe 2011 or '12 to present.

09:07AM

12 Q. And Mr. Furlong is a friend of yours, sir?

09:08AM

13 A. He -- became friends. We -- I met him when

09:08AM

14 he -- I started MyPillow, and we were professional card

09:08AM

15 counters before that. I met him the year 2000.

09:08AM

16 Q. I'm going to direct your attention to some

09:08AM

17 information in this text chain between you and

09:08AM

18 Mr. Furlong.

09:08AM

19 A. Correct.

09:08AM

20 Q. If you go back to Page 11, do you see there's a

09:08AM

21 date in the middle of the top?

09:08AM

22 A. Yes.

09:08AM

23 Q. January 19, 2016, correct?

09:08AM

24 A. That's correct.

09:08AM

25 Q. Do you see that on the left are messages from

09:08AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

18

1	Mr. Furlong?	09:08AM
2	A. Yes.	09:08AM
3	Q. And then do you see on the right, those are	09:08AM
4	messages from yourself?	09:08AM
5	A. Yes.	09:08AM
6	Q. On that date, Mr. Furlong says, "Call me when	09:08AM
7	you can." Do you see that?	09:08AM
8	A. Yes.	09:08AM
9	Q. And you responded, "If I run with Trump...can	09:08AM
10	we count on your vote?" Correct?	09:08AM
11	A. That's correct.	09:08AM
12	Q. Okay.	09:08AM
13	A. I said that because Jim Furlong is a raging	09:08AM
14	left Democratic, and him and I argued over Bush and	09:08AM
15	stuff all the time. So that was very much sarcasm.	09:09AM
16	Q. You were trying to antagonize Mr. Furlong?	09:09AM
17	A. Yes.	09:09AM
18	Q. And he responded the next day on January 20th,	09:09AM
19	2016, correct?	09:09AM
20	A. What's that?	09:09AM
21	Q. He responded the next day to your text?	09:09AM
22	A. Yeah. Yeah.	09:09AM
23	Q. And Mr. Furlong says, "Yes, you can, maybe,"	09:09AM
24	right?	09:09AM
25	A. Right.	09:09AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

19

1 Q. And then he says, "Red alert," right?

09:09AM

2 A. "Red alert" is a different text.

09:09AM

3 Q. Yes. On the next day?

09:09AM

4 A. Right. Yeah, "red alert" has --

09:09AM

5 Q. Okay.

09:09AM

6 A. -- nothing to do with that.

09:09AM

7 Q. Nothing --

09:09AM

8 A. We were talking about Costco. We were talking

09:09AM

9 about Costco. This is stuff in between in our text,

09:09AM

10 sarcasm.

09:09AM

11 Q. Okay.

09:09AM

12 A. Believe me, Jim Furlong would never vote for

09:09AM

13 me.

09:09AM

14 Q. I'm going to direct your attention to another

09:09AM

15 portion of this text, sir. If you could go to Page 13,

09:09AM

16 please.

09:09AM

17 A. Okay.

09:09AM

18 Q. And actually, if you look on -- I'll have you

09:09AM

19 go to 12 instead. There's a date at the bottom that

09:09AM

20 will identify the date from this text chain.

09:09AM

21 Do you see it's February 6, 2016, at the

09:10AM

22 bottom of Page 12?

09:10AM

23 MR. KACHOUROFF: You're on 13, Mike.

09:10AM

24 A. Okay.

09:10AM

25 Q. (BY MS. WRIGLEY) Do you see at the bottom of

09:10AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

20

1 Page 12, it's February 6, 2016?

09:10AM

2 A. Uh-huh.

09:10AM

3 Q. And then if you go to Page 13, do you see it is
4 a continuation of a text from yourself back to
5 Mr. Furlong?

09:10AM

09:10AM

09:10AM

6 A. Right.

09:10AM

7 Q. And in that text, you sent him some
8 attachments. You say, "Morgan Freeman...I'm going to
9 meet Ben Carson right now. I get to go to meet and
10 visit George Bush in Dallas. This is surreal." Do you
11 see that?

09:10AM

09:10AM

09:10AM

09:10AM

09:10AM

12 A. Yes.

09:10AM

13 Q. Mr. Furlong responds, correct?

09:10AM

14 A. Yeah.

09:10AM

15 Q. He says, "I was thinking he is known for being
16 quiet, and you're not, so you could be his running mate.
17 Not that I would vote for you, though!!" Do you see
18 that?

09:10AM

09:10AM

09:10AM

09:10AM

19 A. Right.

09:10AM

20 Q. You responded, "Right," Mr. Lindell?

09:10AM

21 A. Yeah.

09:10AM

22 Q. You say, "Now, that's a great idea!"

09:10AM

23 A. Yeah. Right.

09:11AM

24 Q. "I'm getting together with Trump in three
25 weeks...I think you would rather have two no filter loud

09:11AM

09:11AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

21

1 voices." Do you see that?

09:11AM

2 A. Yeah.

09:11AM

3 Q. You also said, "Trump/Lindell 2016." Do you
4 see that?

09:11AM

09:11AM

5 A. Yeah.

09:11AM

6 Q. And Mr. Furlong responds, correct?

09:11AM

7 A. Right.

09:11AM

8 Q. And then in response to Mr. Furlong's comment,
9 you say, "LOL," right?

09:11AM

09:11AM

10 A. Right. He said, "That would be an F'ing
11 disaster, but entertaining." You see how we banter back
12 and forth.

09:11AM

09:11AM

09:11AM

13 Q. Indeed.

09:11AM

14 A. You could go all the way back to George Bush.

09:11AM

15 And I didn't know anything about politics, but this is

09:11AM

16 just him and I -- when you do your deposition with him,
17 he'll fill you in.

09:11AM

09:11AM

18 Q. Were -- did you have a relationship with former
19 President Trump in 2016, sir?

09:11AM

09:11AM

20 A. No. I met him on August 15, 2016. I've never
21 watched The Apprentice, didn't know who he was. I had
22 heard his name, obviously.

09:11AM

09:11AM

09:11AM

23 Met him in a meeting on August 15, 2016.

09:11AM

24 Walked into his office. It was just him and I. He

09:11AM

25 wanted -- he had asked me to meet him, and his questions

09:11AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
22

1 were, "How is it manufacturing MyPillow here in the 09:12AM
2 USA?" That's what the meeting was about. 09:12AM

3 And then he said -- he -- I said -- he 09:12AM
4 said, "Whatever you do, don't tell them you were a crack 09:12AM
5 addict." 09:12AM

6 And I said -- you know, I said, "I used to 09:12AM
7 be a crack addict." And I kind of looked at him, and I 09:12AM
8 said, "But I'm going to have the Lindell Recovery 09:12AM
9 Network and help addicts all over the country." 09:12AM

10 And he said, "I'm going to shut the 09:12AM
11 wall" -- "shut down the border and stop the drugs 09:12AM
12 pouring in." And it was just a -- he just wanted my 09:12AM
13 opinion as a businessman. 09:12AM

14 And walked out of there about 40 minutes 09:12AM
15 later. He had no other agenda. Went and talked to his 09:12AM
16 employees and everything. 09:12AM

17 I said, "Wow, I've never voted in my life," 09:12AM
18 because I didn't know a filibuster from a milibuster. I 09:12AM
19 didn't know a Democrat from a Republican, and I knew 09:12AM
20 nothing. 09:12AM

21 And anyway, he -- I went and talked to his 09:12AM
22 employees, and all his employees said, "Great man, great 09:12AM
23 boss." And this guy was validating what I had just 09:12AM
24 seen, because it was kind of surreal that he would even 09:12AM
25 want my opinion from Minnesota for the manufacture, but 09:12AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

23

1 any idea he had sounded good.

09:13AM

2 And I got back to Minnesota, and that's
3 where Jim Furlong would come in. I went to a board
4 meeting, and I said -- you know, I said, "I'm going to
5 do a press release and tell the people I met Donald
6 Trump."

09:13AM

09:13AM

09:13AM

09:13AM

09:13AM

7 And half the people -- or not half the
8 people, but one other guy in the room, the -- our -- Joe
9 Springer, at the time, he said, "If you do that, you're
10 going to lose half our business."

09:13AM

09:13AM

09:13AM

09:13AM

11 I said, "Why?"

09:13AM

12 I said, "That doesn't make sense to me."

09:13AM

13 Obviously, media started, and I could walk
14 across the street and there's CBS, CNN, FOX, everyone.
15 How many more employees are you going to hire? How are
16 you helping people with addiction? And I did -- went
17 ahead and did the press release, and the media attacked
18 me like I've never been attacked before at that time.

09:13AM

09:13AM

09:13AM

09:13AM

09:13AM

09:13AM

19 And at that time, it was devastating. They
20 were going to call me a drug dealer, and I had never
21 dealt a drug in my life. I tried to rid Minneapolis of
22 drugs by doing them all.

09:13AM

09:13AM

09:13AM

09:13AM

23 And so there was a -- when I did that, it
24 was like -- then I just -- I'm going what is with this,
25 you know. Because my opinion, I met the guy, I did my

09:14AM

09:14AM

09:14AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

24

1 due diligence, and I'm getting attacked. And this media
2 I broke bread with. I knew all the reporters,
3 everything, and --

4 MR. KACHOUROFF: Mike, hold on.

5 What was the question? I forgot the
6 question.

7 THE WITNESS: Did I meet Donald Trump.

8 MR. KACHOUROFF: Yeah.

9 THE WITNESS: When did I meet him. Did
10 I --

11 MR. KACHOUROFF: If she wants to know more,
12 she'll ask you more.

13 THE WITNESS: Well, I'm telling her more.
14 I mean, I'm going to tell her more.

15 MR. KACHOUROFF: I know. I got it. I got
16 it.

17 Q. (BY MS. WRIGLEY) I'm going to ask you -- let
18 me ask you --

19 MR. KACHOUROFF: Believe me, she'll ask
20 you.

21 Q. (BY MS. WRIGLEY) I'll ask my follow-up
22 question, Mr. Lindell.

23 Have you been a supporter of former
24 President Trump since 2016?

25 A. Since I -- that's where I was getting to, to

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

25

1 pre -- answer your question.

09:14AM

2 When I got out of that office, I thought,
3 you know, I don't know much about politics. I had never
4 voted. I said this guy will be great if he does what he
5 says. And then I went all in.

09:14AM

09:14AM

09:14AM

09:14AM

6 And when I say -- by "all in," I went to
7 this -- the second and third debate by myself, and they
8 put me in the spin room, because I was a pretty
9 nationally known figure then.

09:14AM

09:14AM

09:14AM

09:14AM

10 And I remember MSNBC or FOX, both of them,
11 asked me, you know, "Why are you supporting him?"

09:15AM

09:15AM

12 And I just said, "You know what? I met
13 him, and I think he'll be great because he's a
14 businessman," and that I had done my due diligence.
15 So...

09:15AM

09:15AM

09:15AM

09:15AM

16 Q. So, Mr. Lindell, you've been all in on former
17 President Trump since 2016, correct?

09:15AM

09:15AM

18 A. Uh-huh.

09:15AM

19 Q. And you've been a supporter of President Trump
20 since 2016?

09:15AM

09:15AM

21 A. That's -- since the day I met him.

09:15AM

22 Q. And you were --

09:15AM

23 A. Well, after I did my due diligence, correct.

09:15AM

24 Q. And you were a supporter of former President
25 Trump in connection with the 2020 election, right?

09:15AM

09:15AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
26

1 A. Yes.

09:15AM

2 Q. Okay. And you've attended debates that

09:15AM

3 President Trump has had in the --

09:15AM

4 (Crosstalk.)

09:15AM

5 MR. KACHOUROFF: I'm going to object to all

09:15AM

6 this as relevance -- on the grounds of relevance.

09:15AM

7 A. Yes, I've attended two debates.

09:15AM

8 Q. (BY MS. WRIGLEY) And you've attended a number

09:15AM

9 of political rallies with former President Trump,

09:15AM

10 correct?

09:15AM

11 A. That sounds -- yeah.

09:15AM

12 Q. Okay. How many?

09:15AM

13 A. I don't know. Over a hundred.

09:15AM

14 Q. Do you continue to attend political rallies for

09:15AM

15 former President Trump?

09:15AM

16 A. What's that?

09:15AM

17 Q. Do you continue to attend political rallies for

09:15AM

18 former President Trump?

09:15AM

19 A. Do I continue to? I went to, I think, two this

09:15AM

20 year.

09:16AM

21 Q. Have you donated money to the Trump campaign?

09:16AM

22 A. No. Well, I take that back. 25,000, I

09:16AM

23 believe. I don't know if it was to the campaign. It

09:16AM

24 was to -- that was about a month ago to speak -- it was

09:16AM

25 a speaking thing. It was more for that -- whatever that

09:16AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

27

1 organization. It was the Minnesota something. It was a 09:16AM
2 Lincoln dinner thing, I think. 09:16AM

3 Q. And, in fact, in connection with the 2020 09:16AM
4 presidential election, former President Trump made you 09:16AM
5 head of his campaign in Minnesota, correct? 09:16AM

6 A. It was like an honorary co-chair thing. I 09:16AM
7 didn't do anything but just talk publicly. 09:16AM

8 Q. Can I have you go back to the exhibit that 09:16AM
9 we're looking at, sir, Exhibit 586, and I'm going to 09:16AM
10 have you turn to Page -- give me two seconds to get my 09:16AM
11 place -- Page 32. Just let me know when you're there. 09:17AM

12 A. I see that. 09:17AM

13 Q. Do you see at the top the date is July 24, 09:17AM
14 2016? 09:17AM

15 A. Yeah. 09:17AM

16 Q. Mr. Furlong says, "I'm watching you. You do 09:17AM
17 look presidential. You should run." Do you see that? 09:17AM

18 A. Yeah. 09:17AM

19 Q. And you sent him a number of attachments in 09:17AM
20 response with the comment, "It would not surprise me if 09:17AM
21 I ended up running some day...nothing surprises me any 09:17AM
22 more." Do you see that? 09:17AM

23 A. Yeah. 09:17AM

24 Q. I'm going to ask you about another part of this 09:17AM
25 exhibit, Page 42, sir. Do you see on Page 42, the date 09:17AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

28

1 at the --

09:17AM

2 A. Yeah.

09:17AM

3 Q. -- top is September 30, 2016?

09:17AM

4 A. Yeah.

09:17AM

5 Q. And then on the right, your messages below the
6 attachments, do you see you mention, "I had dinner with
7 the Trumps, and we talked MyPillow LOL." Do you see
8 that?

09:17AM

09:17AM

09:17AM

09:17AM

9 A. Yeah.

09:17AM

10 Q. Mr. Furlong responded, "Nice," correct?

09:17AM

11 A. Right.

09:17AM

12 Q. You responded, "Donald talked me up for five
13 minutes. He was arguing with his wife over which pillow
14 to get. I sided with her LOL." Do you see that?

09:17AM

09:17AM

09:18AM

15 A. Right.

09:18AM

16 Q. And did you have the opportunity to have dinner
17 with former President Trump and his wife in 2016?

09:18AM

09:18AM

18 A. No. No. It was a dinner, and afterwards, I
19 talked to them. That's when I first met her.

09:18AM

09:18AM

20 Q. Okay.

09:18AM

21 A. It was a five-minute conversation. So the
22 dinner was probably 50 people in the room. We were not
23 at their table. I got to talk to them for five minutes
24 afterwards, just them two and myself as we -- as they --
25 everybody had left.

09:18AM

09:18AM

09:18AM

09:18AM

09:18AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
29

1 Q. Can I have you turn to Page 60, sir. At the 09:18AM
2 bottom, do you see that date for the last message is 09:18AM
3 July 18, 2017? Are you with me? 09:18AM

4 A. Yeah. 09:18AM

5 Q. Mr. Furlong states, "Is anything that goes on 09:18AM
6 today going to be broadcast on any channel, and what 09:18AM
7 show did you say was going to air this week? I want to 09:19AM
8 tell the agents." Do you see that? 09:19AM

9 A. Yeah. 09:19AM

10 Q. Let me ask you this: At this point in time in 09:19AM
11 July of 2017, did Mr. Furlong have responsibilities for 09:19AM
12 MyPillow at all? 09:19AM

13 A. Yeah. He was running -- running our home shows 09:19AM
14 and fairs. We have a whole other wing of our business. 09:19AM
15 There's probably 90 -- 90 people that never go home. 09:19AM
16 They go show to show. It's a very complex business 09:19AM
17 with -- we don't have it any more because they cancelled 09:19AM
18 us, but -- well, we do in some respect. State fairs, 09:19AM
19 Costco. We go -- go there and do a three-day show, a 09:19AM
20 four-day show. 09:19AM

21 Somebody's asking there, is that they're -- 09:19AM
22 I would do a lot of speaking. Not anything political, 09:19AM
23 but it would be -- if I was going to be speaking on -- 09:19AM
24 back then, it was all about MyPillow and addiction, you 09:19AM
25 know. I do speaking at a lot of churches. 09:19AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

30

1 So if he was -- if there were going to be 09:19AM
2 broadcasts or something with MyPillow, any special -- 09:19AM
3 anything we were doing -- I did like so many appearances 09:20AM
4 on podcasts. That's what I did. That was a big part of 09:20AM
5 our business. You would do a podcast -- or Sean Hannity 09:20AM
6 or CNN, whatever I would be on, they would want to know 09:20AM
7 because we would get -- we were talking about the 09:20AM
8 pillow. We would get great sales, and these people, 09:20AM
9 they wanted the agents to be aware of it. 09:20AM

10 Q. If you go to the next page on Page 61, do you 09:20AM
11 see that you responded, "Sorry, I just saw this"? Do 09:20AM
12 you see that? 09:20AM

13 A. Uh-huh. 09:20AM

14 Q. Is that a yes? I'm sorry, Mr. Lindell. 09:20AM

15 A. What's that? 09:20AM

16 Q. Was that a yes? 09:20AM

17 A. It was a yes. 09:20AM

18 Q. And then Mr. Furlong responded, "You'd be a 09:20AM
19 good boy in the White House." Do you see that? 09:20AM

20 A. Yes. 09:20AM

21 Q. You respond, "I'm now going on Fox & Friends 09:20AM
22 tomorrow," correct? 09:20AM

23 A. Yes. 09:20AM

24 Q. And the next day, July 19, 2017, Mr. Furlong 09:20AM
25 texted you, "Wow. Your Trump's right-hand man." Do you 09:20AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

31

1 see that?

09:20AM

2 A. Yes.

09:20AM

3 Q. And then you included a link to a C-SPAN
4 article that has the title, "President holds roundtable
5 Made America Agenda."

09:20AM

09:21AM

09:21AM

6 A. Right. That was national. There was eight,
7 nine, ten businesses invited to the White House for Made
8 in America.

09:21AM

09:21AM

09:21AM

9 Q. If you go to the next page on 62, it's a
10 continuation of that text chain on the 19th of
11 July 2017. Do you see that in the middle of the
12 attachments you wrote to Mr. Furlong, "Everyone in the
13 White House wanted my picture. So surreal"? Do you see
14 that?

09:21AM

09:21AM

09:21AM

09:21AM

09:21AM

09:21AM

15 A. That's correct.

09:21AM

16 Q. And then if you go to the next page, on
17 Page 63, do you see after the attachments Mr. Furlong
18 responded, "Cool pics and nice suit"? Do you see that?

09:21AM

09:21AM

09:21AM

19 A. Yeah.

09:21AM

20 Q. And then the next day, you message him back on
21 July 20th, 2017, correct?

09:21AM

09:21AM

22 A. Uh-huh.

09:21AM

23 Q. And you say, "People at the White House asked
24 me if I would consider running for president in 2024.
25 At least four people asked me that." Do you see that?

09:21AM

09:21AM

09:21AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
32

1 A. Correct.

09:21AM

2 Q. And were you, in fact, asked during a visit at
3 the White House in 2017 about potentially running for
4 president in 2024?

09:21AM

09:21AM

09:22AM

5 A. These were the little kids that run around that
6 give -- guide you through the thing. They're interns.
7 They were the ones saying, "You should run in 2024."

09:22AM

09:22AM

09:22AM

8 Q. If you go to the very last page of this
9 exhibit, Page 93, I'm going to ask you about one last
10 one. Do you see the date at the top is June 30th, 2018?
11 Do you see that?

09:22AM

09:22AM

09:22AM

09:22AM

12 A. Yeah.

09:22AM

13 Q. And that's about a year later, correct, from
14 the messages we just saw?

09:22AM

09:22AM

15 A. Yeah.

09:22AM

16 Q. And then you write to Mr. Furlong, "Tell the
17 vendors it's going to be great again." You send an
18 attachment. And you write, "I think I'm going to run in
19 2024." Do you see that?

09:22AM

09:22AM

09:22AM

09:22AM

20 A. Yeah.

09:22AM

21 Q. And Mr. Furlong responded, correct?

09:22AM

22 A. Just a crying face, yes. Once again, our
23 kidding back and forth. He's got a little crying face
24 at me.

09:22AM

09:22AM

09:22AM

25 Q. You can put that aside, and I'm going to show

09:22AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

33

1 you another document, sir.

09:22AM

2 A. What's that?

09:23AM

3 Q. You can put that one to the side. I'm going to
4 mark and show you another document.

09:23AM

09:23AM

5 MR. KACHOUROFF: What did you mark this one
6 as? I'm sorry.

09:23AM

09:23AM

7 MS. WRIGLEY: This one, 586.

09:23AM

8 MR. KACHOUROFF: I'm sorry.

09:23AM

9 MS. WRIGLEY: No. No. That's okay.

09:23AM

10 MR. KACHOUROFF: I don't want to get them
11 mixed up.

09:23AM

09:23AM

12 MS. WRIGLEY: I'm going to mark the next
13 one as 587. Thank you.

09:23AM

09:23AM

14 (Exhibit 587 marked.)

09:23AM

15 Q. (BY MS. WRIGLEY) Mr. Lindell, I'm going to
16 hand you what's been marked as Exhibit 587.

09:23AM

09:23AM

17 And, sir, just for the record, I saw you
18 looking at your phone. You're not recording or
19 anything, are you?

09:23AM

09:23AM

20 A. No. Do you want me to?

09:23AM

21 Q. No.

09:23AM

22 A. Okay.

09:23AM

23 Q. We have an official video, and you can get a
24 copy of it, so --

09:23AM

09:23AM

25 A. Yeah -- but the FBI. Can you hear that, FBI?

09:23AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

34

1 Yeah. I've got to turn you off.

09:23AM

2 Q. No. No. I just don't know that -- to do my
3 job --

09:23AM

09:23AM

4 A. Well, you know, the FBI listens to everything I
5 do, so it's just -- but I'll do it.

09:23AM

09:23AM

6 Q. It listens to everyone --

09:23AM

7 A. They might take a -- maybe they're taking the
8 day off today.

09:23AM

09:24AM

9 Q. Listens to everything everyone does, not just
10 you, I'm sure.

09:24AM

09:24AM

11 Mr. Lindell, I've handed to you what's been
12 marked as 587. Just for the record, this is a news
13 article from CNN that's been printed up.

09:24AM

09:24AM

09:24AM

14 A. Yeah.

09:24AM

15 Q. Just for the record, it has an Exhibit No. 140
16 on the cover sheet. That's because this is a news
17 article that was attached to the complaint in this case.

09:24AM

09:24AM

09:24AM

18 A. Yeah.

09:24AM

19 Q. I'm going to have you turn to the second page
20 of this exhibit.

09:24AM

09:24AM

21 A. Yep.

09:24AM

22 Q. This is a CNN news article. And just so you
23 understand the information on here, at the bottom
24 left-hand corner, it's always a capture sticker. It
25 identifies exactly where on the Internet this article

09:24AM

09:24AM

09:24AM

09:24AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

35

1 was pulled from and exactly the date it was pulled from.

09:24AM

2 A. Yep.

09:24AM

3 Q. And sometimes in order for all of the
4 information, when it gets printed up from the Internet
5 to get captured, sometimes the information repeats from
6 one page to another --

09:24AM

09:24AM

09:24AM

09:24AM

7 A. I understand.

09:24AM

8 Q. -- but I'll represent that it's all in here.

09:24AM

9 A. Right.

09:24AM

10 Q. Do you see this article from CNN Politics
11 titled, "How Mike Lindell, the MyPillow guy, became a
12 midterm messenger"?

09:24AM

09:24AM

09:25AM

13 A. Yes.

09:25AM

14 Q. Are you familiar with this article, sir?

09:25AM

15 A. I've seen that picture a million times. That
16 was that summit we went to. That's the one you just
17 talked about a little bit ago.

09:25AM

09:25AM

09:25AM

18 Q. The date of the article is November 4th, 2018.
19 Do you see that?

09:25AM

09:25AM

20 A. Yes.

09:25AM

21 Q. The article starts, "President Donald Trump
22 isn't get much sleep, and neither is Mike Lindell. But
23 with days to go before the midterm elections, don't
24 blame their pillows. Lindell, the mustachioed MyPillow
25 inventor and infomercial star, is doing his part ahead

09:25AM

09:25AM

09:25AM

09:25AM

09:25AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

36

1 of next Tuesday, hitting the road in support of 09:25AM
2 conservative candidates and popping up at many a Trump 09:25AM
3 rally across the country. Lindell, one of just a few 09:25AM
4 celebrity endorsers, gave Trump his seal of approval 09:25AM
5 early and remains a key supporter." Do you see that? 09:25AM

6 A. Yes. 09:25AM

7 MR. KACHOUROFF: This is all hearsay, and 09:25AM
8 I'm objecting on the grounds of relevance, just so you 09:25AM
9 know. 09:25AM

10 Q. (BY MS. WRIGLEY) And in November of 2018, were 09:25AM
11 you hitting the road in support of conservative 09:25AM
12 candidates at Trump rallies across the country? 09:25AM

13 A. I didn't do many then, I don't believe. I 09:25AM
14 don't -- I don't remember -- if I did a rally, I would 09:26AM
15 go there, sometimes speak, sometimes not. I -- I'm 09:26AM
16 guessing I wasn't doing much speaking at the rallies. 09:26AM
17 But I did go his rallies. I enjoyed going to the 09:26AM
18 rallies, yeah. 09:26AM

19 Q. In November -- 09:26AM

20 A. Did I endorse any people back then? I don't 09:26AM
21 think so. I don't endorse too many people. 09:26AM

22 Q. In November of 2018, had you endorsed former 09:26AM
23 President Trump? 09:26AM

24 A. What's that? 09:26AM

25 Q. In November of 2018, had you endorsed former 09:26AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

37

1 President Trump?

09:26AM

2 A. He wasn't running then.

09:26AM

3 Q. Understood.

09:26AM

4 A. Is that a trick question? I was --

09:26AM

5 I endorsed --

09:26AM

6 Q. Were you a supporter then?

09:26AM

7 A. I endorsed a guy from Minnesota. That's where

09:26AM

8 I got involved, Doug Wardlow. He's also my attorney

09:26AM

9 now. He was running for Attorney General of Minnesota.

09:26AM

10 That's where I was really -- I really got involved on.

09:26AM

11 He was one of the candidates I endorsed then. There may

09:26AM

12 have been one or two others, but that's -- Jason Lewis,

09:26AM

13 I think, from Minnesota. I was kind of concentrating on

09:26AM

14 Minnesota candidates. By then, I realized politics were

09:27AM

15 kind of important. Before I just started, I was smoking

09:27AM

16 crack.

09:27AM

17 Q. I'm going to have you skip ahead to the sixth

09:27AM

18 page of this document, and it's a section titled, "The

09:27AM

19 MyPillow Guy."

09:27AM

20 A. Yeah.

09:27AM

21 Q. Do you see at the bottom there's a heading,

09:27AM

22 "The MyPillow Guy"? Are you with me?

09:27AM

23 A. Yep.

09:27AM

24 Q. It states, "While some companies have faced

09:27AM

25 backlash for supporting Trump, Lindell says the pillow

09:27AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

38

1 business hasn't been affected by his politics. In fact,
2 it's growing. 'It's been very good for business, but I
3 just do what I'm supposed to do, what God's called me to
4 do, and I really -- I'm not going to back down.'"

5 Do you see that?

6 A. Yes.

7 Q. Around this time of the article, November 2018,
8 was it good for MyPillow's business to support Trump?

9 A. We had gotten through -- let me backtrack a
10 little. When that attack came in '16 when I did a press
11 release, the Better Business Bureau came out and lowered
12 MyPillow's rating from an A Plus to an F. It was all
13 political, hundred percent political. I was up for
14 their Torch Award, I was the media's darling, and I was
15 their highest rated company in history for that corrupt
16 organization. And they took an A Plus to an F.

17 They did a press release on January 2nd,
18 2017. At that time, Costco was going to drop us, FOX
19 dropped us, and it was a big fight with the Better
20 Business Bureau, which is still an F.

21 That hurt us substantially then, but by the
22 time as we absorbed that first impact, I guess that it
23 was -- we were back to normal business as usual where
24 MyPillow was at a steady uphill climb. It hadn't hurt
25 us being -- because I got political on one -- when --

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

39

1 you know, why should it, you know.

09:28AM

2 Q. I'm going to have you jump ahead to Page 7,

09:28AM

3 sir --

09:28AM

4 A. Uh-huh.

09:28AM

5 Q. -- and ask you about something at the very

09:28AM

6 bottom, and just let me know when you are there. Like

09:28AM

7 where -- do you see where you say, "I want to get these

09:28AM

8 people help, he said"? Do you see that section?

09:28AM

9 A. What's that?

09:29AM

10 Q. Third paragraph from the bottom.

09:29AM

11 MR. KACHOUROFF: Nicole, I'm going to -- if

09:29AM

12 you're going to -- I'm not trying to be obstructive --

09:29AM

13 MS. WRIGLEY: No. No. That's fine.

09:29AM

14 MR. KACHOUROFF: -- but let him read the

09:29AM

15 whole -- that whole section, not the whole article.

09:29AM

16 MS. WRIGLEY: Yeah. Yeah. That's fine.

09:29AM

17 MR. KACHOUROFF: My -- my --

09:29AM

18 MS. WRIGLEY: I'm actually going to ask him

09:29AM

19 after that part of it, onto the next page.

09:29AM

20 MR. KACHOUROFF: Can you give him that

09:29AM

21 whole section to read so it's at least in some context

09:29AM

22 for him?

09:29AM

23 MS. WRIGLEY: Yeah.

09:29AM

24 Q. (BY MS. WRIGLEY) So, Mr. Lindell, I'm going to

09:29AM

25 ask you about the last two paragraphs on Page 7 and then

09:29AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

40

1 the information going onto Page 8.

09:29AM

2 A. Okay.

09:29AM

3 Q. And then you can take a look at it, review it,
4 and let me know when you're ready.

09:29AM

09:29AM

5 A. Yeah. If you start up above, I'm reading here,
6 it says -- this is the time that everybody was pulling
7 their ads from Fox News. So with MyPillow not leaving,
8 at least we were -- but it did hurt us money-wise,
9 because they went to other parts of Fox, and then the
10 price of the ads went up. They want to boycott me.
11 That's fine.

09:29AM

09:29AM

09:29AM

09:29AM

09:29AM

09:29AM

09:29AM

12 So you're asking me about the "Lindell is
13 open about his crack cocaine addiction" or what?

09:29AM

09:29AM

14 Q. Do you see at the bottom where it says, "As to
15 whether he'd consider entering the political arena
16 himself, Lindell isn't ruling it out"? Do you see that?

09:30AM

09:30AM

09:30AM

17 A. Yeah, I don't -- it doesn't have a quote by it.
18 I don't know -- I see it there.

09:30AM

09:30AM

19 Q. And below there it says, "Right now, no, but if
20 God wanted me to do it, if I got it in prayer, I would
21 do it tomorrow."

09:30AM

09:30AM

09:30AM

22 A. That's right. I pray about everything I do.

09:30AM

23 Q. Do you recall being asked by CNN or any other
24 media in 2018 whether you would consider entering the
25 political arena?

09:30AM

09:30AM

09:30AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

41

1 A. I have no idea. I was interviewed thousands of 09:30AM
2 times a week. Yeah. 09:30AM

3 Q. In -- 09:30AM

4 A. Hundreds for sure. I don't want to say any 09:30AM
5 fake news there. Hundreds. 09:30AM

6 Q. In 2018, is it fair to say that you had not 09:30AM
7 ruled out a run for political office in the future? 09:30AM

8 A. Like I just said, the answer's right there. I 09:30AM
9 do what God has me do. I pray about everything I do. 09:30AM
10 I'm very proactive in prayer. 09:30AM

11 Q. Okay. You can put that one to the side. 09:30AM

12 I'll probably -- I'm going to show you 09:30AM
13 another document, sir. This one will be 588. 09:30AM

14 (Exhibit 588 marked.) 09:31AM

15 Q. (BY MS. WRIGLEY) I'm going to hand to you 09:31AM
16 what's been marked Exhibit 588. And I'll represent for 09:31AM
17 the record that this is a text chain that was produced 09:31AM
18 as DEF 047408 between yourself and an individual, Scott 09:31AM
19 Baio. 09:31AM

20 The full text chain, just for the record, 09:31AM
21 is actually 92 pages. It's long. That's why we didn't 09:31AM
22 print the whole thing up. And I've excerpted, and if 09:31AM
23 you look at the page numbers with the decimal points, 09:31AM
24 the first page, and then Page 15 and 16 of that document 09:31AM
25 produced. 09:31AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

42

1	A. Yeah. Yes.	09:31AM
2	Q. Okay. Mr. Lindell, do you see at the top on	09:31AM
3	the first page this text chain starts May 9th, 2018?	09:32AM
4	A. That's correct.	09:32AM
5	Q. And do you recognize that phone number at the	09:32AM
6	top under your name?	09:32AM
7	A. Yes.	09:32AM
8	Q. Is that your phone number?	09:32AM
9	A. Yes.	09:32AM
10	Q. And then there's a Scott Baio. Do you see	09:32AM
11	that?	09:32AM
12	A. That's correct.	09:32AM
13	Q. And who is Mr. Baio?	09:32AM
14	A. He's -- he played Chachi on Happy Days. You	09:32AM
15	might have watched.	09:32AM
16	Q. I did.	09:32AM
17	A. Yeah.	09:32AM
18	Q. Charles in Charge, maybe?	09:32AM
19	MR. KACHOUROFF: That's why she's asking	09:32AM
20	the questions.	09:32AM
21	MS. WRIGLEY: I'm more of an '80's baby.	09:32AM
22	A. Yeah, that's Scott Baio.	09:32AM
23	Q. (BY MS. WRIGLEY) And he's an actor or former	09:32AM
24	actor?	09:32AM
25	A. Yes.	09:32AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

43

1 Q. Okay. And are you friends with Mr. Baio? 09:32AM

2 A. Now I am. I don't know if I was back then. I 09:32AM

3 had just met him. I don't know if this is -- what year 09:32AM

4 this is. 09:32AM

5 Q. I'm going to ask you about something on the 09:32AM

6 next page, which is Page 15 of this produced text chain. 09:32AM

7 And do you see at the bottom of Page 15, there's a date 09:32AM

8 in the middle, January 24th, 2020? 09:32AM

9 A. Yeah. 09:32AM

10 Q. Okay. And then if you look above there -- 09:33AM

11 sorry. At the very top, do you see there's a date, 09:33AM

12 January 17, 2020? Sorry. I'm directing you back to the 09:33AM

13 top on Page 13. Are you with me? 09:33AM

14 A. Yes. 09:33AM

15 Q. Okay. On January 17, 2020, Mr. Baio texted 09:33AM

16 you, "Brilliant cover. Thanks for the books." Do you 09:33AM

17 see that? 09:33AM

18 A. Yeah. 09:33AM

19 Q. You responded with a thumbs up and said, "Hey, 09:33AM

20 Scott, I'm going on Fox Business News in five minutes." 09:33AM

21 Do you see that? 09:33AM

22 A. Correct. 09:33AM

23 Q. Then Mr. Baio responds, "Okay. Got it on. 09:33AM

24 Good stuff. Run for something...governor." Do you see 09:33AM

25 that? 09:33AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

44

1 A. Yes.

09:33AM

2 Q. And do you recall in early 2020, Mr. Baio

09:33AM

3 texting you about running for governor?

09:33AM

4 A. No. This is -- I mean, he put that -- he had
5 just read my book. When my book came out, I said -- if
6 you'd read my book, you'd find there's a lot of divine
7 things that happened.

09:33AM

09:33AM

09:33AM

09:33AM

8 So he said, "Run for governor."

09:34AM

9 And I said, "I think governor," and that's
10 when -- "and then 2024, look at something bigger."

09:34AM

09:34AM

11 Q. You responded to Mr. Baio in this text chain,
12 correct?

09:34AM

09:34AM

13 A. Yeah.

09:34AM

14 Q. And you said, "I think governor, and then 2024,
15 look at something bigger." Do you see that?

09:34AM

09:34AM

16 A. Yes.

09:34AM

17 Q. He responded on January 24, 2020, "Lou Dobbs?"
18 Do you see that?

09:34AM

09:34AM

19 A. Yes.

09:34AM

20 Q. And then you responded, "Yes, I was on there
21 tonight." Do you see that?

09:34AM

09:34AM

22 A. Yes.

09:34AM

23 Q. And Mr. Dobbs, at this point in time, had a
24 show on Fox News, correct?

09:34AM

09:34AM

25 A. On Fox Business News.

09:34AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

45

1	Q. Called Lou Dobbs Tonight, right?	09:34AM
2	A. Yes.	09:34AM
3	Q. I'm going to have you turn to the next page,	09:34AM
4	Page 16. Do you see at the bottom in the middle there's	09:34AM
5	a date February 1st, 2020?	09:34AM
6	A. Uh-huh.	09:34AM
7	Q. And Mr. Baio texted you, "You around over the	09:34AM
8	weekend?" Do you see that?	09:34AM
9	A. Yes.	09:34AM
10	Q. And you responded, "In Mar-a-Lago," correct?	09:34AM
11	A. Yes.	09:34AM
12	Q. And what's Mar-a-Lago?	09:34AM
13	A. Mar-a-Lago is where the president lives --	09:35AM
14	Q. And Mr. Baio --	09:35AM
15	A. -- our real president. Let me say our real	09:35AM
16	president.	09:35AM
17	Q. Okay. Are you referring to where former	09:35AM
18	President Trump lives?	09:35AM
19	A. I call him the real president. But yes, that's	09:35AM
20	correct.	09:35AM
21	Q. Okay. Mr. Baio responded "Nice," correct?	09:35AM
22	A. Yes.	09:35AM
23	Q. And then you responded, "The president made me	09:35AM
24	his MN campaign director," correct?	09:35AM
25	A. Right.	09:35AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

46

1 Q. And at this point in time, were you made -- did
2 President Trump make you the campaign director in
3 Minnesota?

09:35AM

09:35AM

09:35AM

4 A. No. It was an honorary co-director.

09:35AM

5 Q. What were your responsibilities in that
6 position?

09:35AM

09:35AM

7 A. There wasn't any. Whatever I wanted to do.

09:35AM

8 There's no directives whatsoever. 100 percent, not one
9 directive.

09:35AM

09:35AM

10 Q. What was the -- what was the purpose of your
11 role?

09:35AM

09:35AM

12 A. I had no idea. I went around like a surrogate
13 in Minnesota. I was -- I lived in Minnesota. I went
14 around when -- at that time, I did -- I spoke at the
15 rallies when he came there. I was pushing for Doug
16 Wardlow. Went around with Jason Lewis. You know, that
17 was about it.

09:35AM

09:35AM

09:35AM

09:35AM

09:35AM

09:36AM

18 Q. At that point in time, were you engaging in
19 activities to support President Trump's run for office
20 in 2020?

09:36AM

09:36AM

09:36AM

21 A. What now?

09:36AM

22 Q. At that point in time, were you engaging in
23 activities to support President Trump's run for office
24 in --

09:36AM

09:36AM

09:36AM

25 A. What's the date on this thing? This is '18?

09:36AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

47

1 Q. Yes. The one that we've just looked at was
2 February 2020.

3 A. But that doesn't make sense if you have a
4 campaign director over here. So it was the 2020
5 campaign director or 2018?

6 Q. This was -- this text message is from 2020.

7 A. Okay. Well, then I guess it just carried over
8 to 2020.

9 Q. You can put that aside. I'm going to show you
10 another document, sir.

11 A. Okay.

12 (Exhibit 589 marked.)

13 Q. (BY MS. WRIGLEY) This is 589, sir. I'll
14 represent for the record this is a text chain produced
15 between yourself and Paul Ess. The Bates number for the
16 document produced is DEF 047403. Like the rest one,
17 this one is long. It's over -- it's about 45 pages, so
18 I just have excerpts, and the excerpts are Page 24
19 through Page 30.

20 And then the -- the black on the first
21 page, sir, I'll just represent that is the way it was
22 produced to us, with the assumption by the attorneys
23 that this has been redacted by defense counsel for some
24 reason.

25 A. Okay.

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

48

1 Q. Because they don't believe the information is 09:37AM
2 discoverable is my sense. 09:37AM

3 Who is Paul Ess? 09:37AM

4 A. He's a -- he was a shareholder at that time in 09:38AM
5 MyPillow. He had stock. It's an employee-owned 09:38AM
6 company. 09:38AM

7 Q. And when you say "at that time," what period of 09:38AM
8 time, sir? 09:38AM

9 A. I think he sold his stock, I don't know, in 09:38AM
10 2020, 2021, maybe. I don't know. 09:38AM

11 Q. Was he ever a member of the board? 09:38AM

12 A. No. 09:38AM

13 Q. He was a shareholder of MyPillow, though? 09:38AM

14 A. Yes. 09:38AM

15 Q. And how many -- what was the percentage of 09:38AM
16 shareholder of -- 09:38AM

17 A. I have no idea. 4 or 5 percent. Who knows. 09:38AM

18 Q. And is Mr. Ess a friend of yours, sir? 09:38AM

19 A. Yeah, I would consider him a friend. 09:38AM

20 Q. And how do you know him? 09:38AM

21 A. I knew him -- I had met him -- he's from my 09:38AM
22 area. I guess I had met him years earlier. Lost touch 09:38AM
23 with him. I met him -- he used to be -- frequent one of 09:38AM
24 my restaurants -- or my restaurant I acquired that I had 09:38AM
25 I think in the '90s. I think he -- he was dating a 09:38AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

49

1 friend of mine's daughter.

09:38AM

2 Q. Okay. Sir, I'm going to ask you about a text
3 chain that starts with you and Mr. Ess on Page 24. And
4 if you look at the bottom, it's the second page of the
5 document, there's a date May 19th, 2020. Do you see
6 that?

09:39AM

09:39AM

09:39AM

09:39AM

09:39AM

7 A. Yeah.

09:39AM

8 Q. And do you see Mr. Ess sends you a text about
9 something he watched on last Saturday's SNL? Do you see
10 that?

09:39AM

09:39AM

09:39AM

11 A. Right.

09:39AM

12 Q. And this was an SNL where Alec Baldwin called
13 in as Trump and mentioned your name. Do you see that?

09:39AM

09:39AM

14 A. Yeah.

09:39AM

15 Q. Okay. And then if you look -- if you go to 25,
16 do you see that you responded?

09:39AM

09:39AM

17 A. Yeah.

09:39AM

18 Q. You say --

09:39AM

19 A. "Was it tonight?"

09:39AM

20 Q. -- "No one told me. How are you watching it?"
21 Do you see that?

09:39AM

09:39AM

22 A. Right.

09:39AM

23 Q. And then Mr. Ess responds that he recorded
24 it --

09:39AM

09:40AM

25 A. Right.

09:40AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

50

1 Q. -- and was watching it now. Do you see that?

09:40AM

2 A. Right.

09:40AM

3 Q. Now, I'm going to -- this same date continues
4 with text back and forth, but I want to have you skip a
5 couple pages to Page 27. It's all on the same date.
6 Just let me know when you're there.

09:40AM

09:40AM

09:40AM

09:40AM

7 A. Uh-huh.

09:40AM

8 Q. Do you see -- if you look a little bit below
9 the middle in the right, you text Mr. Ess saying, "The
10 president and I will play this first before we announce
11 it. Paul, we've been giving it to hundreds under the
12 radar. It will change history, and I for sure should
13 win president in 2024. Thumbs up." Do you see that?

09:40AM

09:40AM

09:40AM

09:40AM

09:40AM

09:40AM

14 A. Uh-huh.

09:40AM

15 Q. Okay. Do you know what this is in reference to
16 in terms of like playing this first before it's
17 announced?

09:40AM

09:40AM

09:40AM

18 A. I bought -- I put in \$10 million into a guy
19 that reached out to me. After I spoke at the Rose
20 Garden, he reached out -- it was before the China virus
21 shut everything down, and this guy approached me with
22 the cure to the virus, which is like an Ivermectin or a
23 hydroxychloroquine. It was called "cerativire." I had
24 it validated with doctors, including Ben Carson, and it
25 was a supplement so I could distribute to the country

09:40AM

09:40AM

09:41AM

09:41AM

09:41AM

09:41AM

09:41AM

09:41AM